

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

FILED
IN CLERK'S OFFICE

CIVIL ACTION NO. 04-30054-MAP 2:06

DEBORAH ST. PETER and
MATTHEW BOGACZ,
Plaintiffs

vs.

TOWN OF AGAWAM, TOWN OF AGAWAM
POLICE DEPT., AGAWAM POLICE CHIEF
ROBERT CAMPBELL, ANTHONY GRASSO,
JAMES WHEELER, RICHARD NILES,
KEITH BOPKO, JOHN MOCCIO,
OFFICER MCGOVERN,
Defendants

U.S. DISTRICT COURT
DISTRICT OF MASS.


SCANNED

**DEFENDANTS' RESPONSE TO PLAINTIFFS' MOTION TO COMPEL
DEFENDANTS' DISCOVERY RESPONSES**

The defendants in the above matter respond to the plaintiff's motion by saying that they do not oppose the motion itself, other than to request respectfully that no costs or fees be awarded. Counsel for the defendants, the undersigned, has been doing his best to prepare responses to discovery as quickly as possible. Since the court's extension of the discovery deadlines in a recent Order, counsel has been called for at least two more trials. In addition, he is scheduled to try four trials in the month of January and at least two trials in the month of February. Counsel has been doing his best to juggle preparation of those trials and responses to discovery in this case and other cases as well. He will be without the assistance of a paralegal or secretary during the week of December 27 as well.

It is the hope of the defendants in this case to have responses to the outstanding discovery submitted to plaintiffs' counsel by the middle of the week of January 3, 2005.

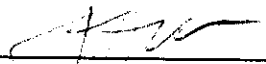
RESPECTFULLY SUBMITTED
THE DEFENDANTS
TOWN OF AGAWAM, TOWN OF
AGAWAM POLICE DEPT., AGAWAM
POLICE CHIEF ROBERT CAMPBELL,
ANTHONY GRASSO, JAMES
WHEELER, RICHARD NILES,
KEITH BOPKO, JOHN MOCCIO,
OFFICER MCGOVERN

By 
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CERTIFICATE OF SERVICE

I, Jeffrey L. McCormick, Esq., hereby certify that on this 23rd day December, 2004, I served a copy of the above upon the parties in the action by mailing, postage prepaid, to counsel, Dawn D. McDonald, Esq., Cooley Shrair P.C., 1380 Main Street, Springfield, MA 01103.

Subscribed under the penalties of perjury.


Jeffrey L. McCormick, Esq.